

# EXHIBIT 2

**IN THE UNITED STATES BANKRUPTCY COURT**  
**FOR THE DISTRICT OF DELAWARE**

In re:	)	Chapter 11
	)	
W.R. GRACE & CO., <i>et. al.</i> ,	)	Case No. 01-01139 (JJF)
	)	Jointly Administered
Debtors.	)	

**ASBESTOS CLAIMANTS' COMMITTEE'S FIRST SET OF  
REQUESTS FOR PRODUCTION OF DOCUMENTS DIRECTED TO THE DEBTORS**

Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure, made applicable to these proceedings by Rules 7026, 9014, and 7034 of the Federal Rules of Bankruptcy Procedure, the Asbestos Claimants' Committee ("ACC") hereby direct Debtor W.R. Grace & Co. ("Grace"), as defined below, to produce the documents described in the Document Requests below for inspection and copying at the offices of Caplin & Drysdale, Chartered, One Thomas Circle, N.W., Washington, D.C., within 30 days of the date of service of these requests, or at such other time and place as may be ordered by the Court or agreed to by counsel.

**DEFINITIONS AND INSTRUCTIONS**

For the purpose of these Requests, and with respect to each Document and item of property requested:

1. As used herein, the words "Debtor," "Grace," or "W.R. Grace & Co.," means the currently existing W.R. Grace & Co. and all its parents, subsidiaries, affiliates, or divisions and its merged or acquired predecessors-in-interest, whether or not Debtors and whether or not successorship is admitted; its and their present or former officers, representatives, employees, agents, servants, counsel employees, investigators, consultants, and all other persons acting on its or their behalf. "You" and "your" refer to Grace as defined in the previous sentence. Subsidiaries or

67. For the time period January 1, 1996 through July 1, 2001, all settlement agreements entered into between Grace on the one hand and Asbestos personal injury plaintiffs or their lawyers on the other hand which settled or resolved more than 100 individual claims.

ANSWER:

68. For the time period January 1, 1995 to January 1, 2002 any letter from Grace or its counsel to Grace's outside auditors (Price WaterhouseCoopers or any other accounting firm which provided audit services to Grace) which mentions or describes Grace's Asbestos personal injury litigation.

ANSWER:

69. Documents setting forth any estimate of asbestos personal injury liability prepared by or for Grace between January 1, 1996 and the present which attempts to estimate the aggregate amount of Grace liability to present and future asbestos personal injury plaintiffs.

ANSWER:

70. Produce any list of "Agreed jobsites" that were incorporated into or attached as exhibits to any settlement agreement ever entered into between Grace and any asbestos personal injury claimant.